

EXHIBIT 3

From: Ronnie Spiegel

Sent: Tuesday, October 11, 2016 2:50 PM

To: 'Adam Wolfson'

Cc: Richard Vagas; klein@butzel.com; 'wfarmer@fbj-law.com'; Carome, Patrick (Patrick.Carome@wilmerhale.com); Bonk, Cameron; Steve Williams; Smith, Brian C. (Brian.Smith@wilmerhale.com); Worthington, Matthew; WShotzbarger@duanemorris.com; dbrownstein@fbj-law.com; Vicky Romanenko

Subject: RE: GM October 18 Deposition -- Designations

Hi Adam,

Thank you very much for your response, and the information about the second day of deposition on Tuesday. I have passed your email along to the point people for the other parties involved.

As long as Tami Froese can address the remaining questions, we agree to your offer for her to testify in place of Lori Wasson.

Regarding next steps, in light of yesterday's call, we are quickly working to put together a letter for you with a list of specific items on which we would like to meet and confer. To get started, however, see below for the Parties' narrowed list of requests that we plan to pursue going forward. We hope to discuss this narrowed list of requests with you, as well as discuss specific types of data and documents learned about through the 30(b)(6) process. We hope to schedule a meet and confer call with you as soon as possible to talk through the issues, and to identify areas of agreement (or impasse, where that may be the case). Perhaps, we can set up a meet and confer call for next Friday, 10/21?

At this point, and without prejudice to our right to seek all materials subject to the Serving Parties' pending motion to compel, the Serving Parties are seeking the following categories of discovery:

Purchase and Procurement:

- Purchasing data for defendant and non-defendant suppliers (starting with the lead three parts if less burdensome);
- Data, or documents in the absence of data, reflecting APRs or other price adjustments in isolation from other price elements for all parts, as well as communications/negotiations concerning such adjustments, from select sources;
- RFQ files and all documents associated with each RFQ to the extent reasonably available (e.g., award justification memo); and
- Agreements with auto parts suppliers (including master agreements).

Cost and Pricing Data and Documents:

- VIN level cost data or, if not tracked at a VIN level, cost data at the least aggregated level this information is tracked, or the most detailed level available for each year, make, model and trim combination, including costs for any options or accessories;

- Data, or documents in the absence of data, sufficient to track each part after it was installed into a vehicle, including model year, VIN, part number;
- Documents from central files and from a small number of custodian's files related to pricing, including back-up materials for internal determinations, internal evaluations, studies, manuals and instructions; and
- Selection from limited number of custodians or central files of internal studies and reports on vehicle cost, vehicle price, the vehicle market, analyses of invoice prices or MSRP, factors that affect cost and any relationship between cost and price.

Sales:

- Data, or documents in the absence of data, sufficient to show the following information for each model (and model year) for each new vehicle sold by the OEM: start of production date, year when sales began, year when sales ended, schedule of base model prices, schedule of MSRP (MSRP for all standard models offered, including base and other standard trim packages), and amounts paid by dealers to the OEMs, including but not limited to, invoice price, dealer invoice price, or factory invoice price;
- Sales data reflecting sales to auto dealers and end-purchasers (including off-invoice payments, incentives, rebates, etc.). If data reflecting off-invoice payments, incentives, rebates, etc. are not available, we request a schedule of off-invoice payments, incentives, rebates, etc. by model that were offered to dealers and end-purchasers; and
- Selection of letters to dealerships announcing invoice and MSRP prices for new models.

Other:

- For all categories requested above, we seek all data and documents that are within your possession, custody, or control, regardless of whether that information came from your own files or the files of a foreign entity or other entity within your corporate family, however we limit the requests to data or documents that pertain only to vehicles sold in the United States regardless of where they were manufactured.

Please note that Auto Dealer Plaintiffs do not join in the request for sales data reflecting sales to end-purchasers or any rebates, incentives or other payments from OEMs to dealers. Also, please note that the Plaintiffs continue to pursue Request No. 31.

Thank you for your cooperation and kind regards,
Ronnie